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16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA  
18 SOUTHERN DIVISION

19 TOMTOM INTERNATIONAL, B.V.,  
20  
21 Plaintiff and Counter-Defendant,  
22  
23 v.  
24  
25 BROADCOM CORPORATION,  
26  
27 Defendant and Counter-Claimant.  
28

Case No. 8:14-cv-00475-PA-DFM

**THE PARTIES' REVISED  
DEPOSITION DESIGNATIONS**

**DEMAND FOR JURY TRIAL**

Complaint Filed: March 28, 2014  
Trial Date: June 9, 2015

**PUBLIC VERSION – EXHIBITS SUBMITTED UNDER SEAL**

1 Plaintiff TomTom International, B.V. (“TomTom”) and Defendant  
 2 Broadcom Corporation (“Broadcom”) hereby provide their revised deposition  
 3 designations pursuant to this Court’s In Chambers Order of May 4, 2015. The  
 4 parties have reformatted their designations in accord with the details set forth in  
 5 that order, and have also sought to minimize both the volume of designations and  
 6 the number of asserted objections.

7 Attached as Exhibit A are TomTom’s deposition designations, as well as  
 8 Broadcom’s objections and counter-designations thereto.

9 Attached as Exhibit B are Broadcom’s deposition designations, as well as  
 10 TomTom’s objections and counter-designations thereto.

11 Dated: May 8, 2015

KEKER & VAN NEST LLP

13 By: Brian L. Ferrall

14 Robert A. Van Nest

Brian L. Ferrall

15 Nikki K. Vo

Andrew Dawson

16 Attorneys for Defendant

17 and Counter-Claimant

BROADCOM CORPORATION

19 Dated: May 8, 2015

VINSON & ELKINS LLP

FENWICK & WEST LLP

21 By: Todd R. Gregorian<sup>1</sup>

22 Todd R. Gregorian

23 Attorneys for Plaintiff

24 and Counter-Defendant

TOMTOM INTERNATIONAL, B.V.

27  
 28 <sup>1</sup> Todd R. Gregorian has concurred and authorized the filing of these joint Revised  
 Deposition Designations on his behalf by Brian L. Ferrall.

**EXHIBIT A**  
**SUBMITTED UNDER SEAL**

**EXHIBIT B**

**SUBMITTED UNDER SEAL**

**CERTIFICATE OF SERVICE**

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Keker & Van Nest LLP, 633 Battery Street, San Francisco, CA 94111-1809.

On **May 8, 2015**, I served the following document(s):

**The Parties' Revised Deposition Designations (Public Version)**

**X** by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.

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Executed on May 8, 2015, at San Francisco, California.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

/s/ Robert W. Thomas

Robert W. Thomas